



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

November 1, 2000

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

RE: COMMENTS ON HPGE CORE COUNTER CALIBRATION REPORT

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the HPGe Core Counter Calibration Report.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko

for Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Mark Shupe, HSI GeoTrans
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

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Ohio Environmental Protection Agency Comments
on the
HPGe Core Counter Calibration Report

- 1) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Comment: It was not clear in the text exactly how consistent density measurements for each core sample were being obtained due to possible slumping and / or compression of the core during sampling. Perhaps a sensitivity analysis would be useful in determining the size of voids that will not introduce unacceptable errors into the measurement. SOPs should be developed which specify that no measurements should be taken when unacceptably large voids are present.

- 2) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Comment: A strategy to radiologically map core sample lengths (with a GM) would give advance notice that the contributions of higher activity segments to proximal lower ones might occur.

- 3) Commenting Organization: Ohio EPA Commentor: ODH
Section #: Pg #: Line #: Code:
Comment: As the manufactured standards anchor the calibration equations and subsequent precertification decisions, it would serve another test for accuracy to have them independently analyzed offsite. Are there any plans to have the standards analyzed at another lab?